U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Site: CSO 019, DC Clean Rivers Division C (aka DC Water CSO 019)
Site Address: 1 Anacostia Park SW, Washington, DC 20003
Permittee Mailing Address: 5000 Overlook Drive SW, Washington, DC 20032

Report Prepared on: June 13, 2013 (Date) By: _____ (Signature), ERG

Report Final as of: October 22, 2013 (Date) By: _____ (Signature), EPA

General Information

Type of Facility/Activity:	Construction
Owner:	District of Columbia Water and Sewer Authority
Operator:	DC Water
Permittee:	DC Water
NOI Submittal Date:	May 15, 2012
NOI Receipt Date:	May 15, 2012 (see Appendix A)
SWPPP Development Date:	September 20, 2011 (Updated April 20, 2012)
SWPPP Developed By:	Wiles Mensch Corporation for Whitman, Requardt & Associates LLP
E&S Plan Development Date:	April, 29, 2011 (for Division C only)
E&S Plan Approved Date:	August 3, 2011
Permit No:	DCR12A032
Effective Date:	June 12, 2012
Expiration Date:	February 15, 2017
Acres Disturbed:	8.25 Acres
Receiving Water and/or MS4:	Anacostia River

Description of Construction Site and Limit of Disturbance:

The District of Columbia Water and Sewer Authority's (DC Water) CSO 019, DC Clean Rivers Division C Project is located in Anacostia Park (US reservation 343F) in South East Washington, DC. The construction site extends approximately 800 feet along the Anacostia River and is surrounded by the DC Water Northeast Boundary Swirl Facility, the Eastside Pumping Station, and a portion of the Robert F. Kennedy Memorial (RFK) Stadium parking lot. The RFK Stadium Access Road and the River Walk Trail run through the site (see Appendix B for a site map).

DC Water is the owner of the project as part of the DC Clean Rivers Projects and Anacostia River Project. The general contractor for construction of DC Water's new CSO 019 is Ulliman Schutte Construction, LLC (USC). While USC is the primary contractor for the project and executes compliance, URS is part of the Program Consultant Organization (PCO) team and is responsible for conducting erosion and sediment control inspections and managing overall environmental compliance at the site. Whitman, Requardt & Associates, LLP is the lead design team for the general contractor.

According to the project description on the DC Water webpage[1], the DC Water Clean Rivers Project (Combined Sewer Overflow Control Program) is an activity of DC Water's Long Term Control Plan (LTCP). At the CSO 019 site the major work includes: 1) construction of a diversion structure to divert CSOs out of the existing Northeast Boundary Trunk Sewer for conveyance to the future tunnel system, and 2) construction of an overflow structure, which will provide flood relief to the northeast boundary area and discharge CSOs to the Anacostia River. The permittee's construction site limit of disturbance (LOD) included in the Erosion and Sediment Control (E&S) Plan was provided to the EPA inspection team during the inspection and is provided in Appendix D.

Both USC personnel and the E&S plans indicated that the project is divided into four construction phases. Construction was in phase three at the time of the EPA inspection. Site mobilization commenced in September 2011 and groundbreaking was in October 2011. All work is scheduled to be completed by August 2013.

On-Site Inspection Overview

Inspection Date: February 20, 2013 **Entry Time:** 8:40 am EDT **Exit Time:** 12:00 pm EDT

Name	Title/Affiliation	Phone
Inspectors:		
Allison Graham	Inspector – U.S. EPA Region 3	(301) 820-3437
Mark Briggs	Inspector – ERG	(989) 345-7595
Kathleen Wu	Inspector – ERG	(703) 633-1625
Site Representatives:		
Chad Flemming	Project Engineer – USC	(202) 543-0680
Jeff Simon	Contract Manager - EPC	(253) 307-7336
Jessica Gorom	PCO Environmental – URS	(301) 820-3437
Nic Patterson	PCO Environmental – URS	(301) 820-3242
Joel Saslo	Superintendent - USC	(202) 543-0680
Anoop Gupta	Assistant Resident Engineer – DC Water	(202) 787-4495
Other Participants:		
Teamrat Gebremedhin	Inspector – District Department of the Environment (DDOE)	(202) 359-3314
Adion Chinkuyu	Environmental Engineer – DDOE	(202) 535-2193

A sign in sheet from the inspection is available in Appendix C.

[1] Available online here: www.dcwater.com/workzones/projects/anacostia_river_information_sheet.cfm.

Credential Presentation:
At the opening conference, Ms. Allison Graham with U.S. EPA Region 3 presented credentials and explained that the purpose of the inspection was to evaluate compliance with the 2012 U.S. EPA General Permit for Discharges from Construction Activities (2012 CGP). The opening conference was attended by representatives from USC, URS, DC Water, and District Department of the Environment (DDOE) (see Appendix C for the full list of attendees). The EPA Inspection team was comprised of Ms. Graham, Mr. Briggs, and Ms. Wu.

Weather and Precipitation:
Partly sunny conditions with temperatures in the high 30°F to low 40°F range were experienced during the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service[2] rainfall data prior to the inspection are provided in the table below.

Rainfall Data Prior to the CSO 019 Inspection

Date	Rainfall Amount (inches)[a]
February 16, 2013	0.02
February 17, 2013	0.00
February 18, 2013	0.00
February 19, 2013	0.08
February 20, 2013	0.00

a. Recorded at Washington Regan National Airport

Documentation:
Documents requested by the EPA inspection team during the inspection and provided by USC after the inspection are listed in Appendix D. Photographs taken during the inspection by Ms. Graham are located in Appendix E, while reconnaissance photographs are located in Appendix F.

The E&S plan, the revised SWPPP, and the construction stormwater inspection records were located on site in the USC trailer and were made available to the EPA inspection team during the inspection. The EPA inspection team viewed the original E&S plans during the inspection.

NOI/Permit Requirements and Observations

The following observations were made relative to the requirements of the Notice of Intent (NOI) for Storm Water Discharges Associated with Construction Activity Under and NPDES General Permit, the 2012 CGP, and the DDOE Chapter 5, Title 21 Municipal Regulations, Sections 500 through 599, Water Quality and Pollution for stormwater runoff from construction sites within Washington, DC.

2012 CGP Section 1.5 (Requirement to Post a Notice of Your Permit Coverage) – The permit requires that the permittee post a sign or other notice conspicuously at a safe, publicly accessible location in close proximity to the project site. At a minimum, the notice must include the NPDES Permit tracking number and a contact name and phone number for obtaining additional project information. The notice must be located so that it is visible from the public road that is nearest to the

[2] National Oceanic and Atmospheric Administration's (NOAA) National Climatic Data Center (NCDC) (http://www.ncdc.noaa.gov/cdo-web/#t=secondTabLink).

active part of the construction site, and it must use a font large enough to be readily viewed from a public right-of-way.

Observation 1: The EPA inspection team did not observe that the permittee posted the NPDES Permit tracking number, a copy of the NOI, or site contact information related to stormwater runoff in a location that was visible to the public. The EPA inspection team did observe a DC Water project sign and a DC Clean Rivers project sign with some construction information situated alongside the public parking lot at RFK Stadium adjacent to the construction site (see Photograph 1 in Appendix E).

2012 CGP Section 2.1.2.3 (Minimize Sediment Track-out) – The permittee must minimize the track-out of sediment from vehicles exiting the construction site onto off-site streets, other paved areas, and sidewalks. To comply with this requirement, the permittee must: a) restrict vehicle use to properly designated exit points; b) use appropriate stabilization techniques at all points that exit onto paved roads so that sediment removal occurs prior to vehicle exit; c) where necessary, use additional controls to remove sediment from vehicle tires prior to exit; and d) where sediment has been tracked-out from the site onto the surface of off-site streets, other paved areas, and sidewalks, the permittee must remove the deposited sediment by the end of the same work day in which the track-out occurs or by the end of the next work day if track-out occurs on a non-work day. In addition, DDOE's Standards and Specifications for Soil Erosion and Sediment Control, Section 1.0 Stabilized Construction Entrances, require a minimum track-out pad length of 50 feet, a minimum track-out pad width of 10 feet, and crushed stone aggregate (2 to 3 inches) placed at least 6 inches deep over the length and width of the entrance.

Observation 2: The EPA inspection team observed that the sediment had filled the voids between the crushed aggregate on 50 feet of the vehicle track out area near Entrance 1 located at the northeast perimeter of the site along the Anacostia River (see Photographs 23 through 25 in Appendix E). EPA inspectors observed the same issue in the crushed aggregate around the concrete truck washout basin also located near Entrance 1 (see Photographs 20 and 21 in Appendix E) as well as at Entrances 2 and 3 (see photographs 50, 58 and 59 in Appendix E). The EPA inspection team observed the tracking of sediment onto the paved areas around Entrances 1, 2 and 3 (see photographs 20, 24, 50, 58 and 59). The EPA inspection team also observed sediment laden riprap at Outfall 1 that drains into the Anacostia River (see Photographs 11through 13 in Appendix E). Following the inspection Mr. Chad Flemming submitted a list of corrective actions that were performed as a result of the EPA inspection team's inspection, which documented that new crushed aggregate had been added to the vehicle track out area near Entrance 1 and that a the polymer membrane filter was placed underneath the concrete truck washout area in order to better retain the concrete washwater around the vehicle washout area (see Item 9 in Appendix D).

2012 CGP Section 2.1.2.4 (Control Discharges from Stockpiled Sediment or Soil) – For any stockpiles or land clearing debris composed, in whole or in part, of sediment or soil, the permittee shall a) locate the piles outside of any natural buffers and physically separate the stockpile from other implemented stormwater controls; b) protect the stockpile from contact with stormwater (including run-on) using a temporary perimeter sediment barrier; c) where practicable, provide cover or appropriate

temporary stabilization to avoid direct contact with precipitation or to minimize sediment discharge; d) not hose down or sweep soil or sediment accumulated on pavement or other impervious surfaces into any stormwater conveyance (unless connected to a sediment basin, sediment trap, or similarly effective control), storm drain inlet, or surface water; and e) unless infeasible, contain and securely protect from wind. Chapter 5, Title 21, Section 543.18 of DDOE regulations for stormwater runoff from construction sites require that a) stockpiled material be covered at the end of each work day; b) remain covered on days when construction work is not conducted at the site; and c) if stockpiled material is not being used or added, it shall be stabilized and protected with mulch, temporary vegetation, hydro-seed or plastic within 15 calendar days after its last use or addition.

Observation 3: The EPA inspection team observed one large stockpile in the stockpile area near the center of the site without perimeter controls. The large stockpile was covered in straw and tracked down (see Photograph 52 in Appendix E).

2012 CGP Section 2.2.1.1 (Deadline to Initiate Stabilization) – You must initiate soil stabilization measures immediately whenever earth-disturbing activities have permanently or temporarily ceased on any portion of the site.

Observation 4: The EPA inspection team observed a sloped portion of the site adjacent to the discharge pipe from Sediment Trap #1 that was exposed and had not been stabilized (see Photographs 34 and 35).

2012 CGP Section 2.3.3.3 (Storage, Handling, and Disposal of Construction Products, Materials, and Wastes) – The permittee must minimize the exposure to stormwater of any of the products, materials, or wastes that are present at the site. For diesel fuel, oil, hydraulic fluids, other petroleum products, and other chemicals, the permittee must store chemicals in water-tight containers, and provide either 1) cover to prevent these containers from coming into contact with rainwater, or 2) a similarly effective means designed to prevent the discharge of pollutants from these areas, or provide secondary containment. The permittee must also clean up spills immediately, using dry clean-up methods where possible, and dispose of used materials properly. Do not clean surfaces or spills by hosing the area down. Eliminate the source of the spill to prevent a discharge or a continuation of an ongoing discharge. For hazardous or toxic waste, the permittee must separate hazardous or toxic waste from construction and domestic waste; store waste in sealed containers, which are constructed of suitable materials to prevent leakage and corrosion, and which are labeled in accordance with applicable Resource Conservation and Recovery Act (RCRA) requirements and all other applicable federal, state, tribal, or local requirements; and store all containers that will be stored outside within appropriately-sized secondary containment to prevent spills from being discharged, or provide a similarly effective means designed to prevent the discharge of pollutants from these areas. The permittee must also clean up spills immediately, using dry clean-up methods where possible, and dispose of used materials properly. Do not clean surfaces or spills by hosing the area down. Eliminate the source of the spill to prevent a discharge or a continuation of an ongoing discharge. For construction and domestic waste, the permittee must provide waste containers of sufficient size and number to contain construction and domestic wastes and on work days, clean up and dispose of waste in designated waste containers.

Observation 5: The EPA inspection team observed two double walled 500-gallon diesel fuel tanks and one 500-gallon used oil tank in temporary earthen structures lined with

a plastic membrane and crushed aggregate (see Photographs 44 and 45 in Appendix E). The inspection team observed oil staining on the aggregate below the used oil tank and on the tank itself (see Photographs 47 and 48 in Appendix E). A spill kit was available adjacent to the tanks (see Photograph 46 in Appendix E). At the time of inspection, no measures were underway to clean up the oil.

Observation 6: See Observation 7.

2012 CGP Section 2.3.3.4 (Washing of Applicators and Containers used for Paint, Concrete, or Other Materials) – The permittee must provide an effective means of eliminating the discharge of water from the washout and cleanout of stucco, paint, concrete, form release oils, curing compounds, and other construction materials. To comply with this requirement, the permittee must: 1) Direct all washwater into a leak-proof container or leak-proof pit. The container or pit must be designed so that no overflows can occur due to inadequate sizing or precipitation. The permittee must also handle washout or cleanout wastes as follows: 1) do not dump liquid wastes in storm sewers; 2) dispose of liquid wastes in accordance with applicable requirements in Part 2.3.3.3 of the CGP; 3) remove and dispose of hardened concrete waste consistent with your handling of other construction wastes in Part 2.3.3.3; and 4) locate any washout or cleanout activities as far away as possible from surface waters and stormwater inlets or conveyances, and, to the extent practicable, designate areas to be used for these activities and conduct such activities only in these areas.

Observation 7:

- The EPA inspection team observed concrete washout residue on the ground in the equipment storage area which is located near Entrance 2 at the northwest perimeter of the site (see Photograph 51 in Appendix E). A water hose adjacent to Entrance 2 was also observed (see Photograph 50 in Appendix E). Entrance 2 slopes toward the Anacostia Park Trail.

- The EPA inspection team also observed hardened concrete primer on the ground in the equipment storage area, downslope of a potable water leak from broken water lines (see Photographs 28 through 30 in Appendix E). The area was not located under cover. According to site personnel, the water lines were broken due to sub-freezing temperatures.

2012 CGP Section 7.4.1.1. (SWPPP Modification) – The permittee must modify the SWPPP whenever changes are made to the construction plans, stormwater control measures, pollution prevention measures, or other activities at the site that are no longer accurately reflected in the SWPPP.

Observation 8: USC personnel stated that the sediment control system originally designed for the site was not sufficient to control sediment at Entrances 1 and 2 and the concrete truck washout area. Therefore, USC constructed three temporary sediment pits. One temporary sediment collection pit was located near Entrance 1 at the northeast corner of the site along the Anacostia River (see Photographs 15 through 17 in Appendix E); the second temporary sediment collection pit was located adjacent to the concrete wash out area (see Photographs 26 and 27 in Appendix A); and the third temporary sediment collection put was located near

Entrance 2, which is located at the northwest perimeter of the site (see Photograph 49 in Appendix E). Water from each of the pits is pumped to Sediment Trap 1 before being discharged to the Anacostia River. The EPA inspection team reviewed the SWPPP and E&S plans provided, and did not observe that the three temporary sediment pits were incorporated as modifications to the SWPPP or E&S plans (see Items 1 through 7 and 17 in Appendix D).